

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (NEWARK)

Caption in Compliance with D.N.J. LBR 9004-1(b)
2017-0417

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Attorney for Citibank, N.A., not in its individual capacity but solely as Owner Trustee for PMT NPL Financing 2015-1

In Re:

Christine Crandon aka Christine A. Hill
Vincent J. Crandon

Case No.: 16-34616-JKS

Chapter: 7

Hearing Date: 03/28/2017 at 10:00am

Judge: Honorable John K. Sherwood

Oral Argument Waived

**NOTICE OF MOTION FOR ORDER VACATING AUTOMATIC STAY
AS TO REAL PROPERTY**

Christine Crandon
aka Christine A. Hill
14 James Brite Circle
Mahwah, NJ 07430

Vincent J. Crandon
14 James Brite Circle
Mahway, NJ 07430

Eric R. Perkins, Trustee
40 West Ridgewood Avenue
Ridgewood, NJ 07450

David E. Sklar, Esquire
1599 Hamburg Turnpike
Wayne, NJ 07470

PLEASE TAKE NOTICE that the undersigned attorney for Citibank, N.A., not in its individual capacity but solely as Owner Trustee for PMT NPL Financing 2015-1 will apply to the United States Bankruptcy Court located at 50 Walnut Street, 3rd Floor, Newark, New Jersey, for an Order to vacate the automatic stay and to authorize the moving party to prosecute a foreclosure action on the basis of 11 U.S.C. §362(d)(1) for a lack of adequate protection and 11 U.S.C. §362(d)(2)(A) for a lack of equity from which the Trustee can pay other creditors.

TAKE FURTHER NOTICE that the moving party waives oral argument and shall be relying upon the Certification Regarding Calculation of Amount Due filed herewith. The property involved is known as 14 James Brite Cir, Mahwah, NJ 07430.

STATEMENT OF NON-NECESSITY OF BRIEF: The Movant submits pursuant to D.N.J. LBR 9013-1(a)(3) that the within motion involves common questions of law and fact and does not involve complex or novel issues such as to require the submission of a legal brief or memorandum.

/s/ William M. E. Powers III

William M. E. Powers III

Attorney for Citibank, N.A., not in its individual capacity but solely as Owner Trustee for PMT NPL Financing 2015-1

Dated: March 7, 2017